



Julie Larsen Maher © WCS

WCS Safeguarding Policy



**Wildlife
Conservation
Society**

OUR MISSION

WCS saves wildlife and wild places worldwide through science, conservation action, education, and inspiring people to value nature.

OUR VISION

WCS envisions a world where wildlife thrives in healthy lands and seas, valued by societies that embrace and benefit from the diversity and integrity of life on earth.

WCS Safeguarding Policy

The WCS Code of Conduct requires all WCS personnel to treat each other and the communities where we work with dignity and respect. WCS is not generally in the business of providing humanitarian aid to people in need, such as the homeless, refugees, and victims of natural disasters, wars and famines. Nevertheless, because many of the people with whom we work are among the poorest and most vulnerable, we need to take special care to ensure that our actions are consistent with the highest internationally accepted standards, with due regard for local laws and customs. Accordingly, WCS will not tolerate abuse or exploitation of children, vulnerable adults or communities with whom we work by WCS personnel or others acting for WCS or under our direction.

This Safeguarding Policy is one element of a broader set of WCS social safeguarding policies and commitments focused on protecting the human rights of Indigenous People, traditional and local communities in the context of our conservation work. Key related policies and commitments are listed at the end of this policy.

Purpose & Applicability

The purpose of this policy is to protect people – particularly children, vulnerable adults and communities with whom we work – from abuse or exploitation that may be caused due to their coming into contact with WCS. This includes harm arising from:

- The conduct of WCS personnel or others acting for WCS or under our direction.
- The design and implementation of WCS’s programs and activities.

This policy sets forth WCS’s commitments, and informs WCS personnel and WCS partners of their responsibilities, regarding safeguarding in connection with WCS’s work and programs. The policy addresses child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse (collectively “safeguarding”). It does not cover:

- Harassment or sexual harassment in the workplace – this is dealt with under WCS’s Harassment/Sexual Harassment Policy.
- Safeguarding concerns in the wider community not attributable to WCS personnel or WCS partners.

This policy applies worldwide to all trustees, officers, employees, volunteers, interns, externs and fellows of WCS (collectively “WCS personnel”), as well as others acting for WCS or under our direction, including without limitation visiting researchers, recipients of WCS funding, independent contractors and their related personnel and contractors (collectively “WCS partners”). WCS projects and programs may establish additional safeguarding standards and procedures, provided they are consistent with, and no less protective than, the minimum standards set forth in this policy.

The General Counsel is designated to administer this policy, with the Social Safeguards Management Team (“SSMT”) and relevant WCS personnel, and to report to the Audit Committee of the WCS Board of Trustees in accordance with this policy.

Responsibilities of WCS

WCS will:

- Comply with all applicable laws, donor requirements and international standards regarding the welfare and protection of children and vulnerable adults.
- Ensure WCS personnel and WCS partners have access to, are familiar with, and know their responsibilities under this policy.
- Design and undertake its programs and activities in accordance with this policy.
- Ensure WCS personnel and WCS partners receive training on safeguarding at a level commensurate with their role in/for the organization.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Employ a survivor centric approach to safeguarding, in which:
 - The rights, safety and well-being of survivors are at the forefront of any response.
 - The survivor is treated with dignity and respect.
 - The privacy and confidentiality of the survivor is maintained where possible.
 - Discrimination based on gender, age, race/ethnicity, sexual orientation or other protected characteristic is not tolerated.
 - The survivor is kept fully informed where possible.

Responsibilities of WCS Personnel & WCS Partners

Child safeguarding

WCS personnel and WCS partners must not:

- Engage in sexual activity with anyone under the age of 18. Mistaken belief regarding the age of a child is not a defense.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional or psychological abuse or neglect.
- Engage in any commercially exploitative activities with children including child labor, trafficking or child pornography.
- Use language, images or behavior that is inappropriate, offensive, harassing, abusive, sexually provocative, demeaning or culturally inappropriate around children.
- Invite or bring unaccompanied children into their home, except for the limited purpose of assisting children at immediate risk of injury or in physical danger.
- Photograph or film a child without obtaining a parent’s or guardian’s informed consent on how it will be used, or in violation of applicable law or custom regarding the photographing or filming of children, including restrictions on reproducing personal images.

- Engage in unsupervised interactions with children. Wherever possible, ensure that another adult is present when working in the proximity of children.

Adult safeguarding

WCS personnel and WCS partners must not:

- Engage in any sexual relationships with vulnerable adults, due to the inherently unequal power dynamics of such relationships.
- Sexually abuse or exploit vulnerable adults.
- Subject a vulnerable adult to physical, emotional or psychological abuse or neglect.

Protection from sexual exploitation and abuse

WCS personnel and WCS partners must not:

- Exchange money, employment, goods or services for sexual activity, including any sexual favors or other forms of humiliating, degrading or exploitative behavior. This covers any exchange for assistance provided to communities with whom we work.
- Support or take part in any form of sexual harassment, violence, exploitation or abuse, including trafficking of human beings.

General

WCS personnel and WCS partners are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this policy.
- Report any good faith complaint, charge, claim or report of a suspected violation of this policy by WCS personnel or WCS partners to the appropriate WCS personnel.
- Ensure that safe, appropriate, accessible means of reporting safeguarding violations are made available to WCS personnel, WCS partners and the communities with whom we work.

Reporting & Responding to Complaints

WCS personnel and WCS partners must report any suspected violation of this policy immediately. Reports may be made verbally or in writing to an employee's line manager, to other appropriate management personnel, to the Office of General Counsel or, alternatively, using the **WCS Global Grievance Redress Mechanism** at safeguards@wcs.org or by mail.

Reports or complaints from external sources such as members of the public and official bodies may be made through the **WCS Global Grievance Redress Mechanism**, or through locally appropriate reporting mechanisms established by WCS.

WCS managers who become aware of a suspected violation of this policy are required to report it to the SSMT or the Office of General Counsel.

In accordance with the WCS Code of Conduct, in response to a good faith report of a suspected safeguarding violation, WCS will, as appropriate (1) conduct a timely investigation, using external resources where appropriate, (2) document and report on the results of the investigation to

management, and (3) take appropriate action based on the facts and circumstances, including where appropriate corrective action to prevent future acts, discipline of employees including suspension and/or termination of employment, and referral to regulatory or law enforcement authorities. The General Counsel shall provide regular reports to the Audit Committee of the WCS Board of Trustees.

All investigations of alleged safeguarding violations must be coordinated with the SSMT and/or the Office of General Counsel. Certain suspected violations, if credible, may require dual reporting within WCS and externally to local authorities or donors. Advice on reporting should be sought in advance from the Office of General Counsel.

Failure by WCS partners to take preventive measures against safeguarding violations, to investigate and report allegations by their personnel, or to take corrective actions when safeguarding violations have occurred, or any other violation under this policy shall constitute grounds for WCS to terminate its agreement or relationship with any WCS partner.

Confidentiality

WCS will protect the confidentiality of safeguarding investigations to the greatest extent possible in order to protect the integrity of the investigation and the safety of the survivor and/or complainant, and to prevent embarrassment, discrimination, harassment or retaliation. Information provided by any individual will be handled as sensitively as possible, and will be shared on a need to know basis only, subject to reporting requirements under applicable law and donor obligations.

Non-Retaliation

Retaliation or threats of retaliation for raising a safeguarding concern in good faith are not acceptable. WCS has a Whistleblower Policy applicable to all WCS personnel that encourages individuals to report any good faith complaint of a suspected violation of law or WCS policy, and prohibits any retaliation for making such complaints.

Safe Recruitment

WCS implements safe recruitment screening procedures when employing WCS personnel and requires appropriate due diligence prior to engaging WCS partners, particularly for individuals who will have any contact with children. This may include confirming the candidate's identity, obtaining verbal references, conducting interviews, and completing a background public records check, including criminal and sex offender database searches, where applicable and available.

Glossary of Terms

Child means a human being below the age of eighteen years.

Emotional or psychological abuse refers to injury to the psychological capacity or emotional stability of a person caused by acts, threats or coercive tactics.

Neglect refers to failure to provide for a person's basic needs within WCS activities that are responsible for the care of a vulnerable adult or a child in the absence of the child's parent or guardian.

Physical abuse refers to acts or failures to act resulting in injury, unnecessary or unjustified pain or suffering, harm or risk of harm to a person's health or welfare, or death.

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Survivor means the person who has been directly abused or exploited. Sometimes also referred to as the victim.

Vulnerable adult means a person who is or may be in need of care by reason of mental or other disability, age or illness, or who is or may be unable to take care of him or herself, or unable to protect him or herself against significant abuse or exploitation.

Contacts

Social Safeguards Management Team (SSMT)

Email: safeguards@wcs.org

Mail: SSMT, WCS, 2300 Southern Boulevard, Bronx, NY 10460, USA, t: +1-718-220-5962

Office of General Counsel (OGC)

Christopher J. McKenzie, WCS General Counsel

Email: cmckenzie@wcs.org, Tel: +1-718-220-6850

Alexa Holmes, Associate General Counsel (Africa)

Email: aholmes@wcs.org, Skype: [wcs.org_aholmes](https://www.skype.com/user/wcs.org_aholmes)

Danièle Pascal-Dajer, Associate General Counsel (Asia)

Email: dpascal-dajer@wcs.org, Tel: +1-718-220-5251

María Elena Urriste, Associate General Counsel (Latin America)

Email: murriste@wcs.org, Skype: [wcs.org_murriste](https://www.skype.com/user/wcs.org_murriste)

Nuno Santos, Associate General Counsel (Europe)

E-mail: nsantos@wcs.org, Tel: +1-718-741-1446

Miriam Widmann, Associate General Counsel (North America)

Email: mwidmann@wcs.org, Tel: +1-718-220-2003

Related Policies (all available on OurWCS)

WCS Code of Conduct

WCS Combating Trafficking in Persons Compliance Plan

WCS Conservation and Human Rights Framework

WCS Global Grievance Redress Mechanism

WCS Harassment/Sexual Harassment Policy

WCS IRB Procedures

WCS Policy on Displacement and Modification of Resource Access

WCS Workplace Violence Prevention Program

WCS Whistleblower Policy

